Addressing unhealthy conditions in rental housing: the case of mould

Wednesday, Mar 19, 2025
10 AM - 12 PM

Mould is one of the most common concerns contributing to unhealthy housing in Ontario

RentSafe.ca | Connecting people across sectors toward healthy housing for all

Financial contribution from / Avec le financement de
Health Canada / Santé Canada

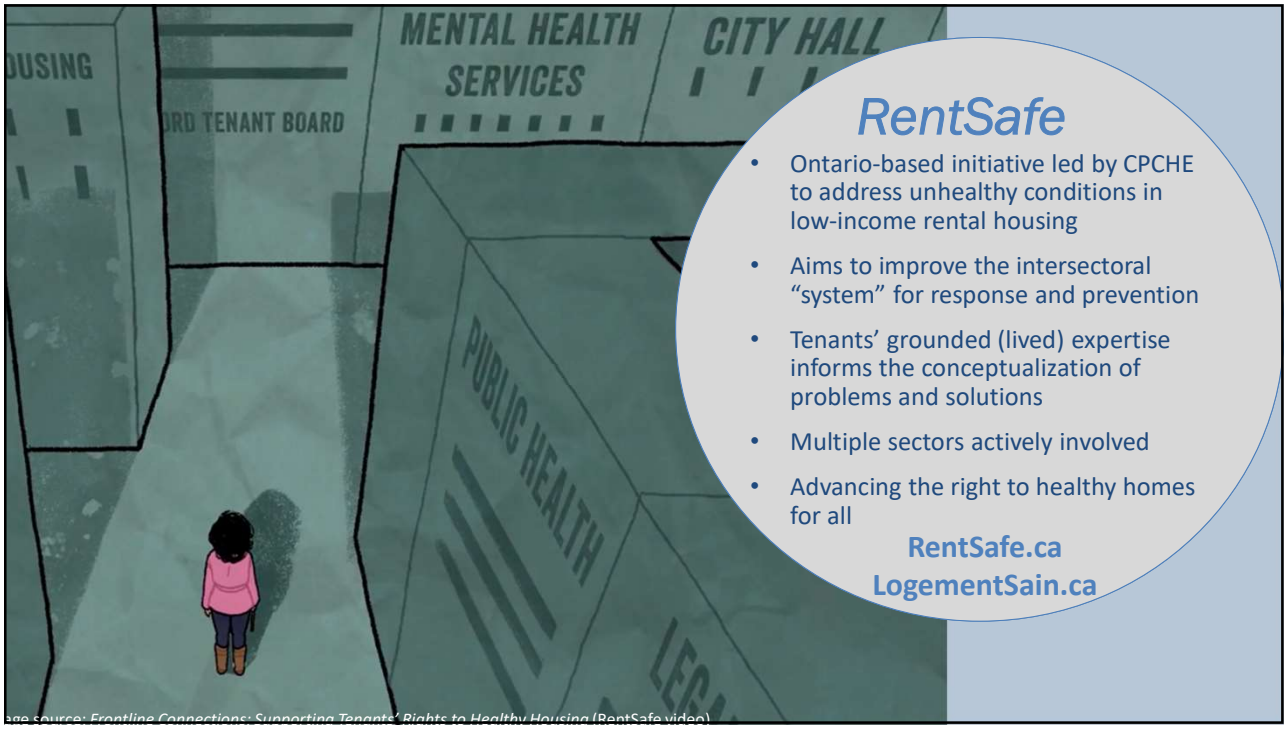

Image source: *Frontline Connections: Supporting Tenants' Rights to Healthy Housing* (RentSafe video)

RentSafe

- Ontario-based initiative led by CPCHE to address unhealthy conditions in low-income rental housing
- Aims to improve the intersectoral "system" for response and prevention
- Tenants' grounded (lived) expertise informs the conceptualization of problems and solutions
- Multiple sectors actively involved
- Advancing the right to healthy homes for all

RentSafe.ca
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Polling

Who is in the room today

A healthy home provides the foundation for health and wellbeing

- Maintaining and improving the quality of existing rental housing is essential to support the **health and wellbeing** of tenants, address the **housing and homelessness crisis** and improve **health equity**

Contextualizing Unhealthy Housing: **Unhealthy Housing and the Housing Crisis**

Rental housing stock is ageing, in decline, in need of repairs, and increasingly unaffordable. Factors contributing to this crisis include

- Reduced government investments
- Increasing financialization of housing
- Climate change
- Reactive and limited response systems
  - Maintenance and housing "standards" are poorly defined
  - Reactive, complaints-based system puts the onus on tenants to identify unhealthy conditions

Mould is inconsistent with healthy housing

- Dampness and mould is one of the most common health and habitability concerns in housing.
- Mould grows in environments with excess moisture, whether due to leaks in roofs or plumbing, poor ventilation, older windows, water damage or damp basements, in housing that is inadequately constructed
- Health Canada considers indoor mould growth to be a health hazard. [1]
- Strong evidence exists linking numerous respiratory health impacts with exposure to indoor dampness and mould, including: exacerbation/worsening of existing asthma, bronchitis, respiratory infections, and other respiratory problems, with children often at greatest risk. [2]

[1] Health Canada (2023). Addressing moisture and mould in your home. https://www.canada.ca/en/health-canada/services/publications/healthy-living/addressing-moisture-mould-your-home.html

[2] Summerbell & Hart (2021). Health Impacts of Indoor Dampness and Mould and Effective Remediation and Prevention Strategies: Expert Review and Summary of Evidence. https://rentsafecanada.files.wordpress.com/2022/02/mould-expert-report_health-impactsremediation.pdf

Unhealthy and unfit conditions in low-income rental housing: an equity issue in Ontario

- Renters with low-income are more likely to experience housing inadequacy
  - A much greater percentage (40.6%) of renters in core housing need lived in inadequate housing (in need of major repair) in 2021, compared to owners in core housing need (16%), or all renters (7.8%).[3,4]
- Ontario's purpose-built rental housing supply is ageing
  - 85% was built before 1980
  - this housing is more affordable than rental housing built after 2000.[5]
- Populations who are disproportionately exposed to the risks of housing-related health inequities include: Renters with low-income, Indigenous peoples, racialized tenants, people who experience disproportionate risk and negative outcomes associated with climate change, and children and youth.

[3] Statistics Canada. (2023). Table 98-10-0234-01 Dwelling condition by tenure: Canada, provinces and territories, census metropolitan areas and census agglomerations. https://doi.org/10.25318/9810023401-eng

[4] Canada Mortgage and Housing Corporation (2021). Core Housing Need (2021) – Ontario. https://www03.cmhc-schl.gc.ca/hmip-pimh/en#Profile/35/2/Ontario

[5] Government of Ontario. (2019). Housing Needs in Ontario. Community housing renewal: Ontario's action plan under the National Housing Strategy. https://www.ontario.ca/document/community-housing-renewal-ontarios-action-plan-under-national-housing-strategy/housing-needs-ontario#

Indigenous housing: an equity issue in Ontario

- Indigenous people in Ontario are 2.5 times more likely to live in housing in need of major repairs than non-Indigenous people, according to Canada's 2021 Census.
  - 5.6% of all households and 8.3% of all renter households in Ontario live in housing in need of major repairs [6]
  - 14.4% of all Indigenous households, and 15.6% of Indigenous renter households in Ontario live in housing in need of major repairs [6]
- A study in Northern Ontario found "Many houses in these First Nation communities had substantial [Indoor Environmental Quality] problems. […] Surface area of visible mould tended to be associated with [upper respiratory tract infection] visits". [7, p.E86]

[6] Statistics Canada. (2023) Table 98-10-0621-01 Population groups by housing suitability and condition of dwelling: Canada, provinces and territories, census metropolitan areas and census agglomerations. https://doi.org/10.25318/9810062101-eng

[7] Kovesi, T., Mallach, G., Schreiber, Y., McKay, M., Lawlor, G., Barrowman, N., ... & Miller, J. D. (2022). Housing conditions and respiratory morbidity in Indigenous children in remote communities in Northwestern Ontario, Canada. Cmaj, 194(3), E80-E88. https://www.cmaj.ca/content/194/3/E80

Mould is widespread
RentSafe Survey of Small-Scale Landlords

- 29% of respondents reported having experienced mould in their rental units.
- 23% of respondents identified mould as the housing condition most harmful to health.
- 95% of respondents feel mould is one of the most important housing conditions to minimize or eliminate.

Mould is widespread
RentSafe Owen Sound Collaborative Tenant Survey: Key Highlights

47% of respondents reported mould in their unit

- Factors that increased likelihood of having mould in the unit:
  - Spending >30% of household income on housing (19% more likely)
  - Living in the unit for longer (24% more likely)
  - Living in a unit owned by a company or corporation (18% more likely)

21% of respondents did not report any bathroom ventilation

- Proper ventilation is essential to prevention of mould

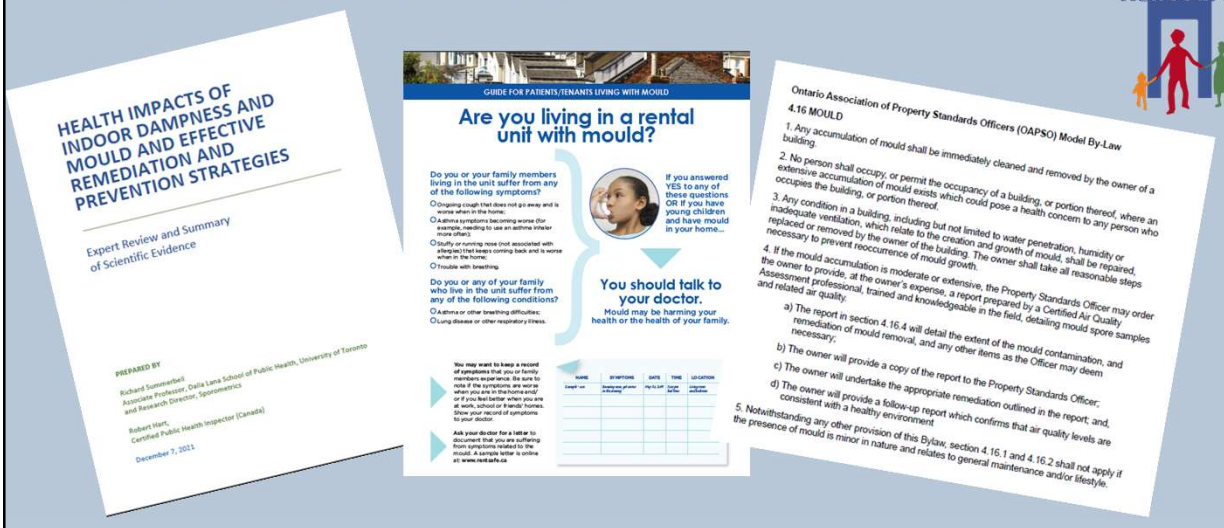
Mould is widespread
RentSafe Owen Sound Collaborative Tenant Survey: Key Highlights

62% of respondents had reported a water leak in their unit in the past 12 months

- Factors that increased likelihood of experiencing a water leak:
  - Being under the age of 35 (45% more likely)
  - Living in the unit for longer (19% more likely)
  - Spending >30% of household income on housing (27% more likely)
  - Living in an older building (23-36% more likely)

- Location of water leaks:
  - Through the walls from outside (38%)
  - Around windows and doors (35%)
  - Through the basement foundation (33%)
  - From the roof (28%)
  - From clogged plumbing fixtures (25%)
  - From leaks in pipes (19%)

Mould resources: RentSafe



https://rentsafe.ca/2019/06/26/new-resources-on-mould-and-health-for-physicians-and-their-patients/

Mould resources: Health Canada

1. Guide to addressing moisture and mould indoors
Eng: https://www.canada.ca/en/health-canada/services/publications/healthy-living/addressing-moisture-mould-your-home.html
Fr: https://www.canada.ca/en/health-canada/services/publications/healthy-living/addressing-moisture-mould-your-home.html

2. Flood clean up and indoor air quality
Eng: https://www.canada.ca/en/health-canada/services/publications/healthy-living/infographic-flood-clean-up-indoor-air-quality.html
Fr: https://www.canada.ca/fr/sante-canada/services/publications/vie-saine/infographie-nettoyage-apres-inondation-qualite-air-interieur.html

3. Chemicals and Pollutants in the Home: Tips for Renters
Eng: https://www.canada.ca/content/dam/hc-sc/documents/services/healthy-home/guide/chemicals-pollutants-home-tips-for-renters.pdf
Fr: https://www.canada.ca/content/dam/hc-sc/documents/services/healthy-home/guide/produits-chimiques-polluants-maison-conseils-pour-locataires.pdf

Agenda

Part 1: Tenant, Indigenous and Health care provider perspectives on addressing mould in rental housing

- Q&A

Part 2: Insights from across sectors to address mould in rental housing

- The legal framework
- Property standards and by-law
- Public health
- Municipal social services
- Non-profit supportive housing provider

Part 3: Putting it all together – Opportunities to improve prevention and responses to mould across sectors

- Panel Discussion and Q & A

Thank you to our partners

Financial contribution from
Avec le financement de

Health Canada / Santé Canada

The views expressed herein do not necessarily represent the views of Health Canada.

Les opinions exprimées ne représentent pas nécessairement celles de Santé Canada.

Thank you

Geri Blinick, geri@healthyenvironmentforkids.ca

Tenant, Indigenous and Health care provider perspectives on addressing mould in rental housing

What are Healthy Energy Homes?

Homes that integrate energy efficiency, climate resilience, cultural appropriateness and occupant health.

They reduce energy costs, lower carbon emissions and create healthier indoor environments by addressing proper ventilation, moisture control and insulation.

This is not a new designation for houses such as Net-Zero, R-2000 or Passive House.

1 Efficiency + 2 Health + 3 Durability

~~High Performance~~

Healthy energy homes

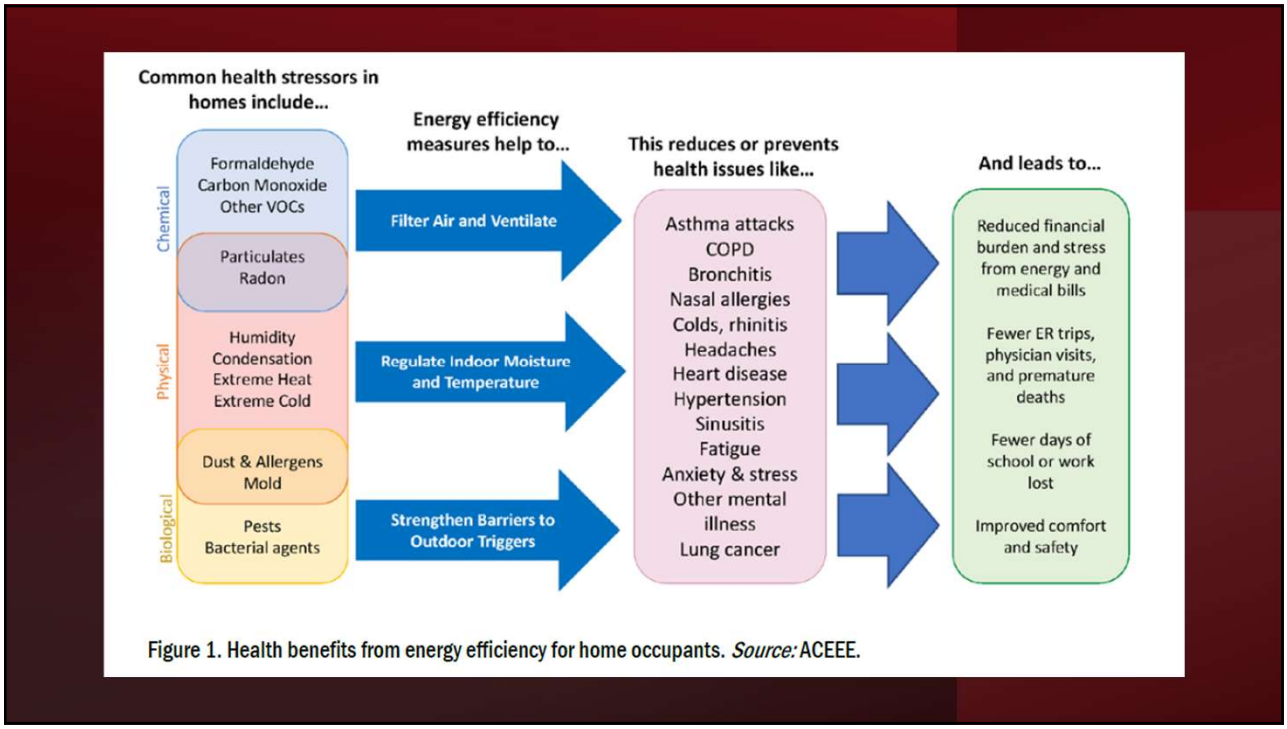


Figure 1. Health benefits from energy efficiency for home occupants. *Source:* ACEEE.

Healthy Efficiency in Action

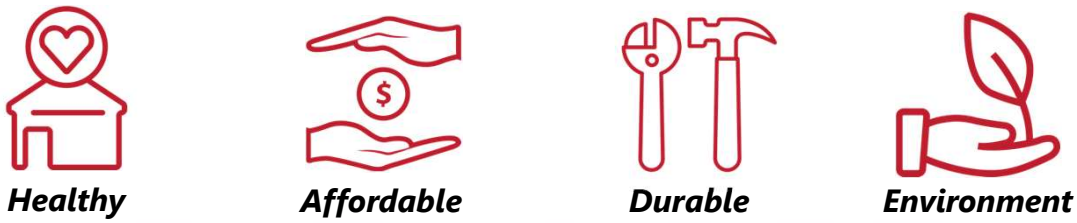
Insulating

Eliminates interior cold spots where moisture condenses, and mold can grow

Ventilation

Brings in fresh air, recovers potential heat loss, and helps manage moisture

Energy Efficiency isn't the goal...



Healthy *Affordable* *Durable* *Environment*

Comfortable *Abundant* *Culturally Appropriate*

Healthy Energy Homes Scoping Paper

- Poor housing leads to higher healthcare costs and worse health outcomes.
- Energy-efficient housing can save communities money and reduce emissions.
- Policy changes are needed to scale Indigenous-led housing solutions.

Opportunities and Next Steps

- New community-driven funding opportunities available for retrofits and new builds.
- Advocacy needed for policy change and Indigenous governance in housing.
- How you can get involved: Support clean energy projects and spread awareness.

ACME CAPE
Association canadienne des médecins pour l'environnement
Canadian Association of Physicians for the Environment

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Evidence-informed perspectives on health sector's role in addressing mould in rental housing

Presenter Info: Donald C Cole MD FRCP(C), Marg Sanborn MD FCFP
Affiliation: CAPE, DLSPH, GAFFI
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Impacts on Health of Mould in housing

Case 1

Child in rental housing with allergic symptoms:

- multiple moulds in various locations throughout the house:
  - Mushroom-like growth under kitchen sink
  - child's bedroom closet adjacent to unvented bathroom - black mould front hall closet - children's backpacks mouldy
- youngest child developed runny nose and generally ill

Case 2

Senior living in co-op apartment in seniors' complex

- chronic condensation around A/C ducts; mould eventually became visible on ceiling
- initial inquiry led to superficial clean-up
- follow-up revealed extensive mould in A/C system and surrounding areas
- multiple units affected
- Symptoms included chronic cough and congestion, fatigue & brain fog

Strength of Evidence – Indoor Dampness & Mould (D&M) Exposure – Respiratory Impacts

Category for Strength of Evidence	Health Impacts of Indoor D/M	
Sufficient evidence of a causal relationship with indoor D/M	Exacerbation of existing asthma in children	
Sufficient evidence of an association with indoor D/M	Asthma: • development • ever-diagnosed • current • exacerbation Bronchitis Eczema	Respiratory infections • Dyspnea (chest tightening, difficulty breathing), Wheeze, Cough • Allergic rhinitis • Upper respiratory tract symptoms

Hung LL, et al. (2020). *Recognition, Evaluation, and Control of Indoor Mold*. American Industrial Hygiene Association

Strength of Evidence – Indoor D/M Exposure – Multi-system Health Impacts

Category for Strength of Evidence	Health Impacts of Indoor D/M	
Sufficient evidence of an association with indoor D/M*	Adults - depression, stress, and anxiety	Children - emotional symptoms and emotional dysregulation
Limited or suggestive evidence of an association with indoor D/M	• Common cold like symptoms • Allergy/atopy	
Inadequate or insufficient evidence to determine whether an association exists with indoor D/M	Altered lung function Multiple chemical sensitivity – chemical intolerance †	Any other health effect not listed above

Hung LL, et al. (2020) (cont)…

* Gatto MR *et al.* (2024) *Environmental Health Perspectives* 132(8):1-12 https://doi.org/10.1289/EHP143

Vulnerability to mould health impacts

About 10% of population and 25-40% of atopic persons are allergic to mould. Particularly vulnerable include:

- children, cystic fibrosis, asthmatics, respiratory conditions
- immune suppressed including haematological malignancies, cancer patients chemoTx & radiation, HIV positive, transplant patients

But, not everyone in household will present with clinical symptoms

Summerbell & Hart (2021). Health Impacts of Indoor Dampness and Mould and Effective Remediation and Prevention Strategies: Expert Review and Summary of Evidence.
https://rentsafecanada.files.wordpress.com/2022/02/mould-expert-report_health-impactsremediation.pdf

Precautionary approach to mould

- Mould is a health hazard, so its presence is not consistent with healthy housing
- Health Canada (2023):
  - ...recommends controlling dampness indoors and cleaning up any visible mould regardless of the type of mould present
  - Immediate action is important. Mould will begin to grow in an area with excessive moisture within 48 hours.

Health Canada (2023). Guide to addressing moisture and mould indoors.
https://www.canada.ca/en/health-canada/services/publications/healthy-living/addressing-moisture-mould-your-home.html

Assessment of mould health impacts

Document Exposure

- General environmental exposure history (Community, **Home**, Hobby, Occupation, Personal, Diet & Drugs)*
- Self-reported **visible mould** and **mould size** proven accurate#
- Air testing for mould generally **not helpful** for either quantity or type of mould
- Photos of mould sources by patient – caregiver

Classification of Extent of Visible Mould

Small	Moderate	Extensive
3 or fewer patches and the total area is less than 1m²	If there are more than 3 patches or if the patches are greater than 1m² but less than 3m²	If a single patch is larger than 3m²

Source: Canada Mortgage and Housing/Health Canada

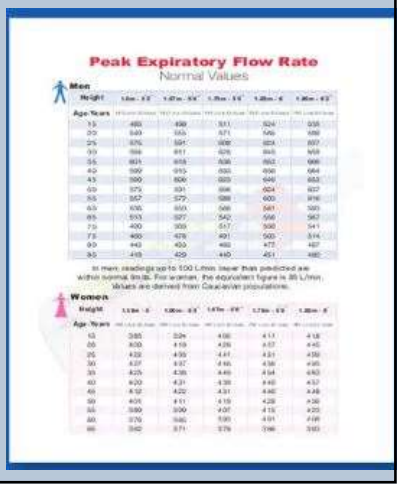
Photo source: https://www.canada.ca/en/health-canada/services/publications/healthy-living/addressing-moisture-mould-your-home.html

*https://aseq-ehaq.ca/wp-content/uploads/2020/07/Taking-an-Exposure-History-CH2OPD2.pdf

Li A *et al.* (2024) Research Square. https://doi.org/10.21203/rs.3.rs-4162197/v1

Patient – Caregiver Document Symptoms

- **Diary of symptoms** (own or child - dependent's) in response to exposures
  - when worse e.g. when stuck indoors,
  - what may relieve symptoms e.g. walking outside, using medication
- **Fluctuating health status monitoring** e.g.
  - serial peak flows by asthmatics with readings in mouldy area or shortly thereafter and away from mouldy environment for at least a day
  - cell phone photos of rash exacerbations
  - pain intensity (VAS scale) for headaches



Clinical Testing

Condition appropriate e.g.

- WBC, CXR, pulmonary function testing for respiratory conditions
- cognitive testing & depression scale for mycotoxic neurological effects
- skin-prick allergen testing for recurrent rashes - limited suite panel (Alternaria, Cladosporium, Penicillium, Aspergillus, Candida)

Larenas-Linnemann et al. (2016). *J Allegy Clin Immunol Pract*. 4(3): P405-414
http://dx.doi.org/10.1016/j.jaip.2015.10.015

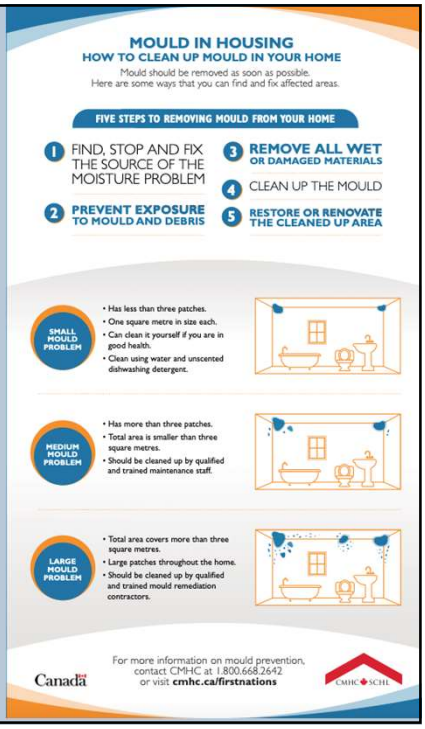
- **Specific fungal disease** e.g. *allergic bronchopulmonary aspergillosis (ABPA)*
  - consider provincial public laboratory available fungal serology testing

Cole, D., et al. (2017). *Lancet ID.* 17(12): e412-e419
https://www.thelancet.com/journals/laninf/article/PIIS1473-3099(17)30308-0/fulltext

Promoting health benefits of mould clean up and remediation

Source/exposure reduction

- Building owner to reduce humidity sources e.g. fix leaky plumbing, install extractor fans in bathroom & dehumidifiers in basements
- Practical mould remediation guidance in: *Part 2 Rentsafe Mould Expert Report* https://rentsafecanada.files.wordpress.com/2022/02/mould-expert-report_health-impactsremediation.pdf
- Cleanup of mould - bleach not recommended; materials removal e.g. mould impregnated wall board. Professional cleanup if extensive
  - CMHC: https://www.cmhc-schl.gc.ca/professionals/industry-innovation-and-leadership/industry-expertise/indigenous-housing/develop-manage-indigenous-housing/maintenance-solutions/mould-in-housing



Use personal protective equipment (PPE) during mould cleanup e.g. flooding

- With climate change, more Canadian communities are facing flooding, and greater mould exposure.
- Survey of 103 immunosuppressed residents affected by flooding: 49% engaged in cleanup of mould and water-damaged areas BUT only 43% of those doing heavy cleanup wore a respirator*
- To reduce barriers to PPE use, tenants should be provided with N-95s/KN95s masks, safety glasses or goggles and impermeable gloves during mould removal.

* Chow, N.A., et al. (2019). *Morbidity and Mortality Weekly Report*. 68(21), 469-473 . http://dx.doi.org/10.15585/mmwr.mm6821a1

Instrumental - Social Support & Advocacy

- Clinicians, as trusted/respected providers, can play a key role:
  - Assist with documentation and refer to specialists, as appropriate
  - Help source personal protective equipment (PPE) for cleanup
  - Support negotiations with building owner +/- move to other accommodation
  - Advocate for mould free healthy housing https://ontario.cmha.ca/news/ontarios-doctors-call-for-greater-investments-in-housing-programs/
  - Connect patients with community supports (e.g., public health, property standards inspectors, legal aid) https://rentsafe.ca/2019/06/26/new-resources-on-mould-and-health-for-physicians-and-their-patients/

GUIDE FOR PHYSICIANS AND SAMPLE LETTER

Supporting patients with health effects related to mould

If your patient presents with symptoms related to mould exposure in their rental unit, it will be helpful for your patient to have a letter confirming these symptoms.

The template below is intended to assist physicians' with providing such a letter. Please adapt the letter as needed. This letter can be used by your patient to help them in advocating for proper cleaning of the mould and remediation of the underlying moisture problem causing the mould growth.

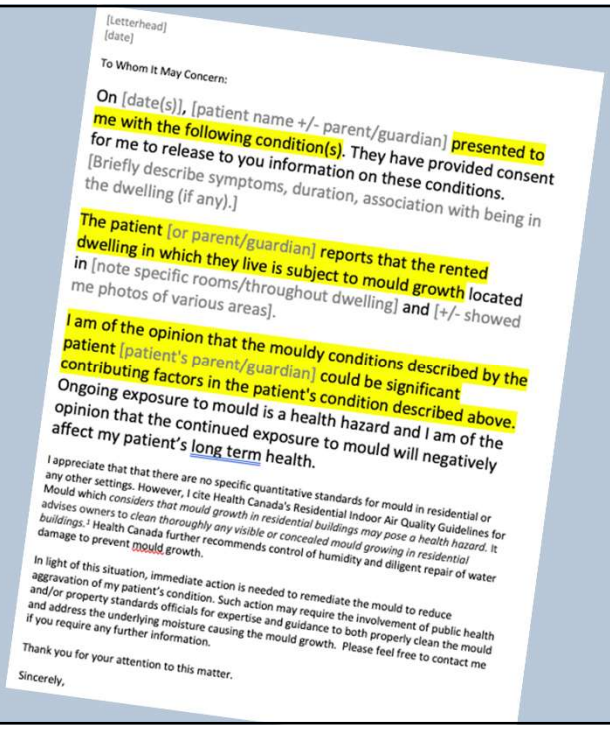
You may want to refer your patient to the following organizations:

1. A community legal clinic to help in advocating with the landlord for proper clean up and remediation.
2. Public Health agency for an inspection of the unit* and proper instructions on cleaning mould.
3. Municipal property standards department for inspection and remediation requirements to deal with the underlying cause of the mould growth.

For more information on mould and health effects, please refer to the *Enviro-Occ for Family Docs* podcast on mould at: https://cpd.fammedmcmaster.ca/

* Note: Local Public Health Agencies' policies relating to inspections of private homes may differ within and across provinces/territories, depending on jurisdiction.

https://rentsafe.ca/2019/06/26/new-resources-on-mould-and-health-for-physicians-and-their-patients/



[Letterhead]
[date]

To Whom It May Concern:

On [date(s)], [patient name +/- parent/guardian] presented to me with the following condition(s). They have provided consent for me to release to you information on these conditions. [Briefly describe symptoms, duration, association with being in the dwelling (if any).]

The patient [or parent/guardian] reports that the rented dwelling in which they live is subject to mould growth located in [note specific rooms/throughout dwelling] and [+/- showed me photos of various areas].

I am of the opinion that the mouldy conditions described by the patient [patient's parent/guardian] could be significant contributing factors in the patient's condition described above. Ongoing exposure to mould is a health hazard and I am of the opinion that the continued exposure to mould will negatively affect my patient's long term health.

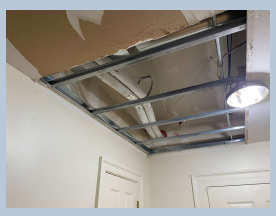
I appreciate that that there are no specific quantitative standards for mould in residential or any other settings. However, I cite Health Canada's Residential Indoor Air Quality Guidelines for Mould which considers that mould growth in residential buildings may pose a health hazard. It advises owners to clean thoroughly any visible or concealed mould growing in residential buildings.[1] Health Canada further recommends control of humidity and diligent repair of water damage to prevent mould growth.

In light of this situation, immediate action is needed to remediate the mould to reduce aggravation of my patient's condition. Such action may require the involvement of public health and/or property standards officials for expertise and guidance to both properly clean the mould and address the underlying moisture causing the mould growth. Please feel free to contact me if you require any further information.

Thank you for your attention to this matter.

Sincerely,

Cases Revisited



- Mom with children moved out of rental unit
- Senior in co-op building:
  - Primary care MD recognized mould exposure as contributor to physical, cognitive impacts
  - Repeated advocacy by residents led to fulsome investigation and response
  - Adult children provided portable, responsive HEPA filter air cleaner (not ionizing)
  - Remediation underway: significant replacement needed of ceiling, walls; multiple units

Comments & Questions?

Key Resource:

https://rentsafe.ca/2019/06/26/new-resources-on-mould-and-health-for-physicians-and-their-patients/

Insights from across sectors to address mould in rental housing

The Landlord Self-Help Centre and the Grey-Bruce Community Legal Clinic are funded by Legal Aid Ontario

RENTSAFE MOULD PRESENTATION: THE LEGAL FRAMEWORK

PRESENTED BY:

LANDLORD'S SELF-HELP CENTRE

Grey Bruce Community Legal Clinic

March 19, 2025

RESIDENTIAL TENANCIES ACT

THE RESIDENTIAL TENANCIES ACT (RTA)

- Applies to most residential rentals in Ontario.
- Provides a framework on rights and responsibilities for both tenants and landlords, how to end a tenancy, how to legally resolve disputes.
- Cannot "contract out" of the Act: the RTA applies even if there are contrary provisions in a rental agreement.
- Establishes the Landlord and Tenant Board (LTB): a "Board" is similar to a court; it is where landlords and tenants apply for a legal remedy and evictions.

LANDLORD RESPONSIBILITIES: MAINTENANCE OBLIGATIONS

LANDLORD'S RESPONSIBILITY TO REPAIR

20 (1) A landlord is responsible for providing and maintaining a residential complex, including the rental units in it, in a good state of repair and fit for habitation and for complying with health, safety, housing and maintenance standards. 2006, c. 17, s. 20 (1).

- SAME

(2) Subsection (1) applies even if the tenant was aware of a state of non-repair or a contravention of a standard before entering into the tenancy agreement. 2006, c. 17, s. 20 (2).

The information offered in this presentation is intended as general information, it is not legal advice

LANDLORD'S SELF-HELP CENTRE

PROPERTY REPAIRS

- A LANDLORD MUST KEEP A RENTAL PROPERTY IN A GOOD STATE OF REPAIR. ALL THINGS THAT THE LANDLORD PROVIDES TO THE TENANT MUST BE KEPT IN WORKING ORDER. THIS COULD INCLUDE:
  - Electrical, plumbing or heating systems
  - Appliances
  - Carpets in the unit or common areas
  - Walls, roofs, ceilings
  - Windows, doors, locks, lighting
  - Garages, laundry rooms, patios, walkways or pools

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LANDLORD'S SELF-HELP CENTRE

TENANTS RESPONSIBILITIES: ORDINARY CLEANLINESS AND DAMAGES

TENANT RESPONSIBILITY FOR CLEANLINESS

33. The tenant is responsible for ordinary cleanliness of the rental unit, except to the extent that the tenancy agreement requires the landlord to clean it.

TENANT'S RESPONSIBILITY FOR REPAIR OF DAMAGE

34. The tenant is responsible for the repair of undue damage to the rental unit or residential complex caused by the willful or negligent conduct of the tenant, another occupant of the rental unit or a person permitted in the residential complex by the tenant. [ie. Guests of the tenant]

Undue Damage means out of the ordinary; over and beyond normal wear and tear caused by ordinary use

Willful or negligent actions (rather than from lack of maintenance or ordinary wear and tear): **Willful** requires intent to damage; **negligent** requires an act or omission that a tenant ought reasonably to have known would result in damage

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The information offered in this presentation is intended as general information, it is not legal advice

LEGAL PROCESS

A TENANT CAN BRING AN APPLICATION TO THE LANDLORD AND TENANT BOARD IF THE LANDLORD FAILS TO DO REPAIRS UNDER S. 20. THIS IS CALLED A "T6 APPLICATION".

- Bringing a case to the Board takes time and can be very difficult for a tenant.
- Tenants need to ensure that they have a good written records of communications and documentation; many tenants need emotional support in this process.
- The Board tends not to award high compensation to tenants but can make orders for the repair to be done; however enforcement can be difficult if the landlord refuses to comply.

A LANDLORD CAN BRING AN APPLICATION TO THE LANDLORD AND TENANT BOARD IF THEY CLAIM THE TENANT CAUSED THE MOULD GROWTH BY THEIR ACTIONS AND CAUSING DAMAGE TO THE UNIT. THIS IS CALLED A "L2 APPLICATION".

- The landlord can obtain an Order for the tenant to pay for the costs to fix the damage and/or eviction order

All Applications need EVIDENCE (documents, pictures, inspection reports, etc) to be successful.

THERE ARE TIME LIMITS TO FILE THESE APPLICATIONS SO IT IS IMPORTANT TO RECEIVE INDEPENDENT LEGAL ADVICE FOR INDIVIDUAL CIRCUMSTANCES.

GBCLC

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CASE LAW

METROPOLE MANAGEMENT (TORONTO) CORPORATION V. ALY, 2024 ONSC 5637

- This was a combined hearing by the landlord for an eviction based on undue damage and a tenants' application for disrepair both based on extensive mould growth in the unit.
- The landlord claimed that the state of uncleanliness in the unit contributed to the mould growth; there was a water leak in the bathroom and they alleged that the moisture level showed that the fan was not being used, contributing to the mould.
- The tenant claimed that the humidity in the bathroom was very high, that air flow in the unit was the problem, causing mould to grow and spread throughout the unit and the landlord had failed to respond to requests to investigate the ventilation system.
- The Board found in favour of the tenant: the landlord had failed to repair the unit in a timely manner and breached their responsibilities under s. 20 (the Landlord's responsibilities to repair).
- The Board ordered the landlord to clean and repair the ventilation system within 2 weeks; they also Ordered a rent abatement of 10% for 1 year to the Tenant.

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CASE LAW: A LEGAL PROCESS TAKES TIME

METROPOLE MANAGEMENT (TORONTO) CORPORATION V. ALY, 2024 ONSC 5637

TIMING: 9 TO 10 YEARS FROM START OF PROBLEM

- The tenant started renting the unit in 2009.
- The landlord and tenant both acknowledged that there was an ongoing problem with mould in the rental unit since **2015.**
- There was a water leak in the tenant's bathroom in 2020; the mould became worse and present throughout the unit on the ceilings and walls; most severely in the bathroom.
- The applications to the Board were filed in 2022; the applications were heard over 2 days in August and October 2023; an Order issued in January 2024.
- an appeal was filed by the landlord and heard by Divisional Court in September 2024 and an Order issued in **October 2024,** upholding the LTB's decision. The legal process took about 2 years.

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ADDITIONAL CASES

Barta v. Rudolph 2018 ONSC 6208 carswell ont 17232 (Ont Divisional Court)

- A tenant who did mould testing showing the presence of spores must provide an opportunity for the landlord to investigate and remediate the problem and cannot unilaterally terminate a 1 year lease (in this case the tenant suffered from mold toxicity and had terminated a 1 year lease without consent of the landlord).

Wrona v. Toronto Community Housing, 2014 ONSC 5743 2014 (Ont Divisional Court)

- A tenant was unsuccessful in his claim for compensation where the landlord had offered to move the tenant to another mould-free unit / and when the tenant refused entry to the landlord to do repairs.

Sarangan v. Morguard Nar Canada Limited Partnership 2018 ONSC 2864 (Ont Divisional Court)

- The tenants were found responsibility for mould damage when they kept the unit very hot and humid; the landlords during an annual inspection requested the tenants not keep the unit so hot and humid, to use exhaust fans and to open the windows; expert evidence at the hearing linked the mould to the temperature and humidity levels kept by the tenants (including using a humidifier); the tenants also had an obligation to inform the landlord of the black spots when first observed so as to give the landlord an opportunity to remedy the problem before it worsened. The cost of mould remediation was $24,000. The landlords here also immediately offered another unit to the tenants so that they could do the mould remediation work needed in the unit.
- A finding of mould growth did not necessarily mean there had been undue damage. "Undue" meant out of the ordinary or not wear and tear caused by ordinary use. Here the mould damage had been undue, due to the severity and extent of the growth and the extreme remediation measures that had been required. Both reports supported that the unit had not been fit for habitation

Ontario Divisional Court: this is the appeal court that Landlords and Tenants can appeal decisions from the Landlord and Tenant Board

The information offered in this presentation is intended as general information, it is not legal advice

LSHC LANDLORD'S SELF-HELP CENTRE

LANDLORD BEST PRACTICES: INSPECTIONS

- LANDLORDS SHOULD DO AN INSPECTION AT THE TIME OF MOVE IN AND AT THE TIME OF MOVE OUT
- THE LANDLORD SHOULD MAKE REASONABLE EFFORTS TO LIMIT THE FREQUENCY OF ENTRIES
- LANDLORDS SHOULD BE CAUTIOUS OF TENANTS RIGHTS AND PRIVACY WHILE CARRYING OUT INSPECTIONS
- LANDLORDS MAY TAKE PICTURES, PROVIDED THE PICTURES ARE RELATED TO THE INSPECTION OR REPAIR

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LSHC LANDLORD'S SELF-HELP CENTRE

ENTRY WITH NOTICE

A LANDLORD MUST PROVIDE **24 HOURS' WRITTEN** NOTICE BEFORE THE TIME OF ENTRY

REASONS FOR NOTICE:

- To carry out a repair or replacement or to do work in the unit;
- To carry out an inspection of the rental unit for the purpose of determining whether the rental unit is in a good state of repair and fit for habitation.

WRITTEN NOTICE MUST INCLUDE:

- The reason for entry;
- The date of entry;
- Who is entering; and
- The time of entry between 8:00 am and 8:00 pm.

The information offered in this presentation is intended as general information, it is not legal advice

LANDLORD'S SELF-HELP CENTRE

SERVING THE NOTICE OF ENTRY

- THE LANDLORD MAY GIVE A 24-HOUR WRITTEN NOTICE OF ENTRY TO THE TENANT BY:
  - HANDING IT TO THE TENANT;
  - HANDING IT TO AN APPARENTLY ADULT PERSON;
  - PLACING IT IN THE TENANT'S MAIL BOX OR WHERE MAIL IS ORDINARILY DELIVERED;
  - SLIDING IT UNDER THE TENANT'S DOOR;
  - POSTING IT ON THE TENANT'S DOOR;
  - COURIER OR MAIL WITH ADDITIONAL TIME ADDED; OR
  - EMAIL IF THE PERSON OR PARTY RECEIVING IT HAS CONSENTED IN WRITING TO SERVICE BY EMAIL.

The information offered in this presentation is intended as general information, it is not legal advice

LANDLORD'S SELF-HELP CENTRE

TENANTS: BEST PRACTICES

REPORT SIGNS OF MOULD & WATER LEAKS TO THE LANDLORD

- Best to do this in writing (text, email, letter) and keep a copy

ALLOW ENTRY FOR INSPECTION UPON BEING PROVIDED WITH PROPER NOTICE

- Tenants do not need to be present for the inspection but it is good if you are able to be there and communicate your concerns to the landlord; if you are anxious about this inspection, ask for a family member / friend to be with you.

ENSURE GOOD AIR FLOW BY USING EXHAUST FANS IN BATHROOM AND COMPLETE REGULAR ORIDINARY CLEANING

- If you are going to clean small patches of mould, follow the guidelines from Public Health

IF YOU CONTINUE TO HAVE MOULD GROWTH AND YOUR LANDLORD IS NOT RESPONDING TO YOU, GET LEGAL ADVICE FOR NEXT STEPS. To find a free Legal Clinic is your area: https://www.legalaid.on.ca/legal-clinics/ or call 1-800-668-8258

The information offered in this presentation is intended as general information, it is not legal advice. Everyone's situation may be different: If you have a particular concern about your unit, obtain individual legal advice.

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CONTACT INFORMATION

LSHC LANDLORD'S SELF-HELP CENTRE

55 UNIVERSITY AVENUE, 15TH FLOOR
TORONTO, ONTARIO M5J 2H7

TELEPHONE: 416-504-5190

TOLL FREE: 1-800-730-3218

EMAIL: INFO@LANDLORDSELFHELP.COM

WEBSITE: LANDLORDSELFHELP.COM

Grey Bruce Community Legal Clinic

945 3rd Ave East
Suite #2
Owen Sound, ON
N4K 2K8

TEL 519-370-2200
TOLL FREE 1-877-832-1435
WEB gblegalclinic.com
FAX 519-370-2110

Legal Aid Ontario / Aide juridique Ontario

To find a legal clinic in your community:

https://www.legalaid.on.ca/legal-clinics/

Property Standards and By-Law

PRESENTED BY ALEXANDER WRAY AND MICHAEL FOSTER

What is Property Standards?

Property standards by-laws are minimum maintenance by-laws that enforces minimum standards for all types of properties.

Property standards by-laws get their authority through the Building Code Act.

Every owner of a property that is in a municipality is responsible to ensure their property conforms to the by-laws, whether that property is rural or urban.

Property Standards Enforcement is “a spoke in the wheel” of a larger part of enforcement tools and abilities to achieve voluntary compliance.

Property Standards Example

45 MOULD

45.1 Every building shall be maintained reasonably free of Mould.

45.2 Removal of Mould shall be done by a person using personal protection and proper cleanup methods.

45.3 The Owner may be required to hire a contractor experienced in water damage and mould remediation to complete the remedial work.

45.4 The Owner may be required to provide an initial environmental assessment report from a Professional Engineer with a Masters in Occupational Hygiene, a Certified Industrial Hygienist, or a Registered Occupational Hygienist, that identifies, and details, a remediation plan, to mitigate the following:

(a) the extent of Mould contamination and the identity of the any contributory source,

(b) any indoor pesticide contamination and sources of exposure,

(c) the extent of water damage and indoor moisture problems, and

(d) other items as the Officer may deem necessary.

Example from Town of Milton by-law no. 131-2012

The Process

1. Complaint received

The municipality will receive a complaint about a property not conforming with the by-law.

Complaints usually come from tenants within a rented property, though neighbors can also file complaints for any exterior issues.

In most cases, municipalities do not accept anonymous complaints and complainants are required to provide their name, address, and contact information.

2. Property Inspection

An officer will inspect a property to determine compliance with the by-law.

Officers do not have authority to enter any place being used as a dwelling without the permission of the occupant or obtaining a search warrant.

During an inspection, the officer will look for any issues that would be in violation of the respective property standards by-law.

If the by-law does not speak to a specific issue, officers have no authority to make an owner fix it.

3. Orders

Once it is determined that a violation of the by-law has occurred, officers can order a property owner to remediate the issue.

Orders issued under a property standards by-law must be served on the owner personally or through registered mail.

Owners are given 14 days from the time the order is served to appeal it, and a minimum of 14 days from the time the order is served to carry out the work. However, order compliance timelines vary significantly based on the scope of work and must be deemed reasonable in the eyes of the courts.

4. Non-Compliance

Should an owner not complete the work outlined in an order, the municipality has the authority remediate the non-compliance on behalf of the property owner and add the cost of remediation plus fees on the property taxes.

Owners can also face a fine of up to $10,000 under the Provincial Offences Act.

Timelines

How long does it take to remediate?

Generally, under property standards, an owner must be given 14 days from the time the order is served to appeal the order and a minimum of 14 days to complete the work.

If an owner cannot be reached in person to serve the order, it is sent by registered mail and deemed served after 5 days.

Mold and other issues can generally be remediated within a few days once the compliance and appeal dates have passed. This process generally takes between 15-30 days from the initial inspection depending on the severity of the issue and the scope of work at hand (Ex. Contractor requirements, cost of work, availability, access to property, etc.)

Enforcement Challenges

Lack of Legislation

Without a by-law in place that speaks to mold, municipalities have no authority to order property owners or occupants to remedy the concern.

In the absence of municipal property standards by-laws, landlords and tenants would need to address their concerns of non-compliance through the Landlord Tenant Board.

Frivolous Complaints

Municipal Enforcement Officers are often called to complex situations between tenants and landlords. While issues of non-compliance do exist inside of rental accommodations, Municipal Enforcement Officers greatly depend on the co-operation of all involved parties to identify an issue and ensure subsequent compliance. As Officers are neutral parties in investigative matters, they can be summonsed by both the accused and the victim at Landlord Tenant Board Hearings.

Many municipalities have implemented variations of Frivolous and Vexatious complaint policies to address residents and tenants who deliberately cause damage or file vexatious complaints to cause harm or disrepute to their neighbour/landlord/tenant.

Staffing Levels

With the continued aging of our rental housing stock, and rising demands on municipalities for higher standards and increased inspections, municipalities often face resource challenges delivering By-law Services.

A recent benchmarking of staffing in York Region found that the average Officer to Population ratio was approximately 1:10,000 residents.

Questions?

Public Health Sector – Addressing Mould Concerns in Rental Housing

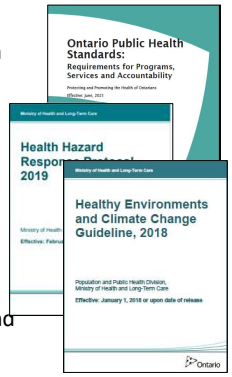
Helen Doyle, Environmental Health Workgroup Chair
Ontario Public Health Association
Marivi Barrios, Environmental Health Specialist
Toronto Public Health
Burgess Hawkins, Manager, Health Protection Division
Public Health Sudbury and Districts

Intersectoral Webinar: Addressing Mould and its Health Effects in Rental Housing
March 19th 2025

Public Health Mandate in Ontario

Requirements* applicable to housing:

- **Investigate** potential health hazards
- **Inspect facilities** where there is an elevated risk of exposures to health hazards
- **Engage in community and multi-sectoral collaboration** to:
  - Reduce exposure to health hazards
  - Decrease health inequities
  - Promote healthy built environments
- **Use best available evidence** to inform public health action
- **Engage priority populations** in planning of public health interventions
- **Engage municipalities in healthy environment strategies** e.g. policy and bylaws related to housing conditions



***Flexible approach**: Balances the need for province-wide standardization, with the need for variability to respond to local needs, priorities and contexts

Collaboration for Effective Public Health Response

Public Health Professional Associations:

- OPHA partnering with RentSafe team and National Collaborating Centres for Public Health on policy advocacy and outreach e.g. Public Health Unit survey
- OPHA and Canadian Institute of Public Health Inspectors (CIPHI Ontario Branch) collaboration with property standards association on model mould bylaw

Local Public Health Units:

- Working with local bylaw and other community supports to determine the most effective way to address the issue – health hazard, structural issues, underlying/upstream determinants of health

Key Public Health Takeaways

- **Health Evidence** – People living in homes with mould and damp conditions are more likely to experience health effects. Some people are more susceptible.
- **Health Canada Guidelines**: (1) Prevent mould growth: Control moisture, repair water damage, (2) Remediate: Indoor mould growth should be removed
- **Public Health Mandate**: Investigate health hazards, promote healthy environments; Public health practice is evidence-based, equity-focused, collaborative, and responsive to local needs and context (flexibility built-in)
- **Local Public Health Response**: Informed by local context - municipal structure, local partnerships, bylaws; enforcement authority (HPPA, local bylaws), joint inspections, referrals; health promotion and education
- **Partnerships**: Cross-sectoral collaboration is key to effective public health response for healthy housing for all – national, provincial, local

OPHA
Ontario Public Health Association
l'Association pour la santé publique de l'Ontario

Resources

- Ontario Public Health Standards. 2021 https://www.ontario.ca/page/ontario-public-health-standards-requirements-programs-services-and-accountability
- Health Canada: Guide to Addressing Moisture and Mould Indoors https://www.canada.ca/en/health-canada/services/publications/healthy-living/addressing-moisture-mould-your-home.html
- Health Canada: Residential Indoor Air Quality Guidelines: Mould https://www.canada.ca/en/health-canada/services/publications/healthy-living/residential-indoor-air-quality-guideline-moulds.html
- National Collaborating Centre for Environmental Health https://ncceh.ca/resources/subject-guides/mould-assessment-remediation-and-building-resilience#h2-0

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l'Association pour la santé publique de l'Ontario

Mould Investigations

Toronto Public Health

TORONTO

Mould Investigations – an Urban Example

Toronto Public Health
Presented by: Marivi Barrios, Environmental Health Specialist
Date: March 19, 2025

TORONTO

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Mould Investigations – an Urban Example

311/Health Connection	Toronto Public Health (TPH)	Municipal Licensing and Standards (MLS)
- Requests for investigation are received - If further investigation is warranted, calls are triaged to either Toronto Public Health or Municipal Licensing and Standards for further follow-up	- Investigation is referred to TPH when there is a suspected health hazard due to mould - TPH may call upon MLS for support in the case of a suspected structural deficiency or large extent of damage from mould	- Investigation is referred to MLS when there is a known structural deficiency or large extent of damage from mould - MLS may call upon TPH for support in the case of a suspected health hazard after structural deficiencies are rectified

TORONTO

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Health Hazard Conditions

Work with the owner/property manager	Make referral to and consult with other divisions	When ownersbecome un-cooperative, absent or unresponsive
• Provide guidance and information on proper remediation	• E.g. MLS or Public Health Ontario (PHO) where necessary • Joint investigations where necessary	• When owners/property managers become un-cooperative, absent or unresponsive

TORONTO

Marivi Barrios
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TORONTO

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Mould Response
Public Health Sudbury & Districts

Burgess Hawkins
Manager, Health Protection
hawkinsb@phsd.ca

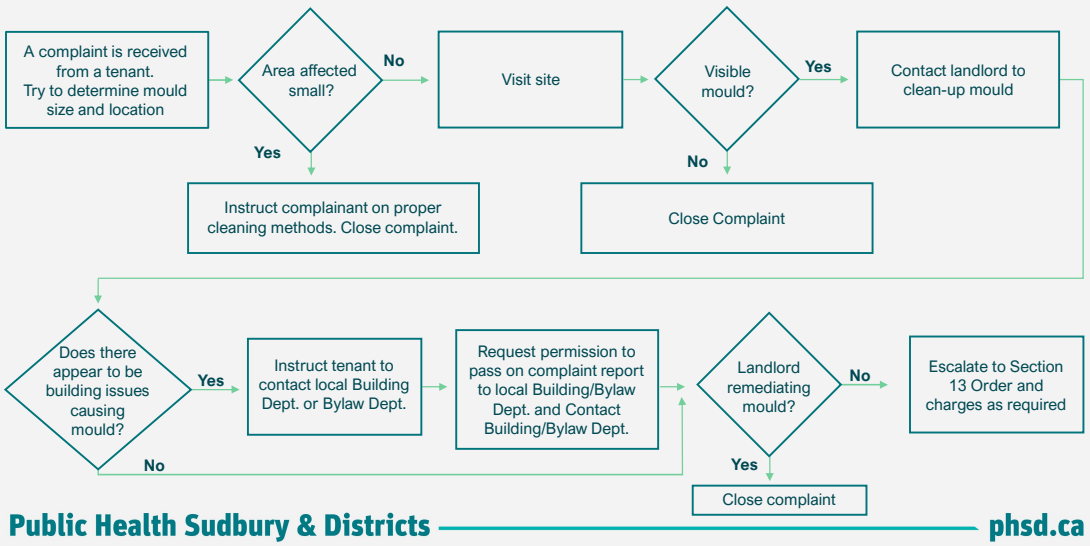
Public Health
Santé publique
SUDBURY & DISTRICTS

Public Health Sudbury & Districts

- A public health unit separate from all municipalities in our jurisdiction
  - Area: 46 167 km^2
  - Population: 202 431
- 2 regional districts and one single-tier city
- Wide range of population centers:
  - 1 city, 160 000 population
  - 1 town, 5000 population
  - 8 towns/townships, 1000 to 3500 population
  - 8 towns/townships, less than 1000 population
  - unorganized territories, 3100 population (35 625 km^2)
  - 13 First Nations

Public Health Sudbury & Districts — phsd.ca

Standard mould response in a municipality



Public Health Sudbury & Districts — phsd.ca

Other scenarios

- Multiple complaints
  - Work in conjunction with local Bylaw Dept. Public Health deals with mould issues, Bylaw handles issues covered by *Property Standards Bylaw*.
- Unorganized territories
  - No municipalities to work in conjunction with
  - Use moral suasion to attempt to get repairs to residences
- Tenant cannot physically or mentally do the work needed to have the issue remediated
  - Normally issue raised by another tenant or landlord
  - Gain entry
  - Gain tenant's trust
  - Find out if they have local supports (family, religious, etc.)
  - Try to get them to get help from local social or mental services

Public Health Sudbury & Districts — **phsd.ca**

OMSSA
ONTARIO MUNICIPAL SOCIAL SERVICES ASSOCIATION

The role of municipal social services in addressing mould in community and rental housing

Ontario Municipal Social Services Association

Darryl Wolk – Manager of Policy Development and Public Affairs

Municipal Social Services

- The Ontario Municipal Social Services Association (OMSSA) is a non-profit association whose members are Ontario's Consolidated Municipal Service Managers (CMSMs) and District Social Services Administration Boards (DSSABs).
- In Ontario, core social services like income support, child care and early years services and social housing are planned, managed and co-funded by municipal Service System Managers.
- Ontario's municipal governments fund the majority of costs as a result of the province transferring these responsibilities to municipal governments in 1998. Ontario's 47 Service System Managers oversee systems planning and manage the delivery of local human services in a way that is integrated, people-focused and outcomes-driven.
- Municipalities have service level standards under the Housing Services Act

Housing and Homelessness: Municipal Roles and Responsibilities

- Managing 260,000+ affordable housing units, representing a combined $40-billion asset
- Providing affordable homes to more than 680,000 Ontarians
- Administering funding, overseeing standards, and providing capacity building to more than 1,500+ non-profit and co-operative housing providers
- Managing wait lists and access to affordable housing for their communities, according to provincial and local priorities
- Providing affordable housing options across the continuum of housing needs, from shelters, transitional and supportive housing to rent-geared-to-income (RGI) and affordable rental
- Meeting the unique and complex housing needs of their communities, informed by the priorities set out in their 10-Year Housing and Homelessness Plans, as well as provincial and federal programs and legislation

Ontario Housing and Homelessness Stats (Scope of the Issue)

- 232,419 households were on waitlists for rent-geared-to-income (RGI) housing in 2024, an 8.9% increase from 2023.
- The number of RGI units (178,636) has not kept pace with rising demand.
- Total funding for housing programs increased from $1.4 billion in 2016 to $2.5 billion in 2024.
- Municipal contributions grew by 108%, rising from $792 million in 2016 to $1.64 billion in 2024, now covering 65.1% of all housing funding.
- Ontario's municipalities are also the primary funders of community housing in Ontario, contributing more than $1.77 billion annually.
- Most of the community housing stock in Ontario is between 18 and 50 years old, and the cost to address the backlog of needed repairs is $1.5 billion.
- In Ontario, 46% of rental households are paying more than 30% of their income on rent – and more than 1 in 5 are putting more than 50% of their income towards rent.
- In 2024, Ontario's homelessness system provided an estimated 27,138 beds across: 17,770 emergency shelter spaces, 3,520 transitional housing spaces and 5,848 supportive housing spaces.

Ontario Housing and Homelessness Stats (Vulnerable populations)

- 81,515 people experienced homelessness in 2024—a 25% increase since 2022. 41,512 people are chronically homeless, making up 51% of all cases—a tripling since 2022.
- 25% of people experiencing chronic homelessness are children and youth.
- 4,418 Indigenous people were reported as chronically homeless in 2024, representing (10.6% of cases despite making up only 2.9% of Ontario's population).
- 10,552 refugees and asylum seekers were chronically homeless in 2024 — a 475% increase since 2021
- There are currently over 1400 homelessness encampments in Ontario.
- Issue is growing faster in Northern and rural communities compared to larger cities and regions.

Challenging Issues in Housing and Homelessness sector in addressing mould

- Landlord tenant board (Decision times)
- $1.5B repair backlog, long wait lists (Funding needed to avoid lost units)
- Lack of Mental health and addictions supports (Supportive Housing needed)
- By-law enforcement at lower tier (Collaborate, standardize)
- Provider agreements (End of Mortgage negotiations with providers)
- Rental vacancies and costs (Shortage of affordable units, COHB)
- Home child care inspections and licensing
- Provincial legislation (Provincial direction on mould)

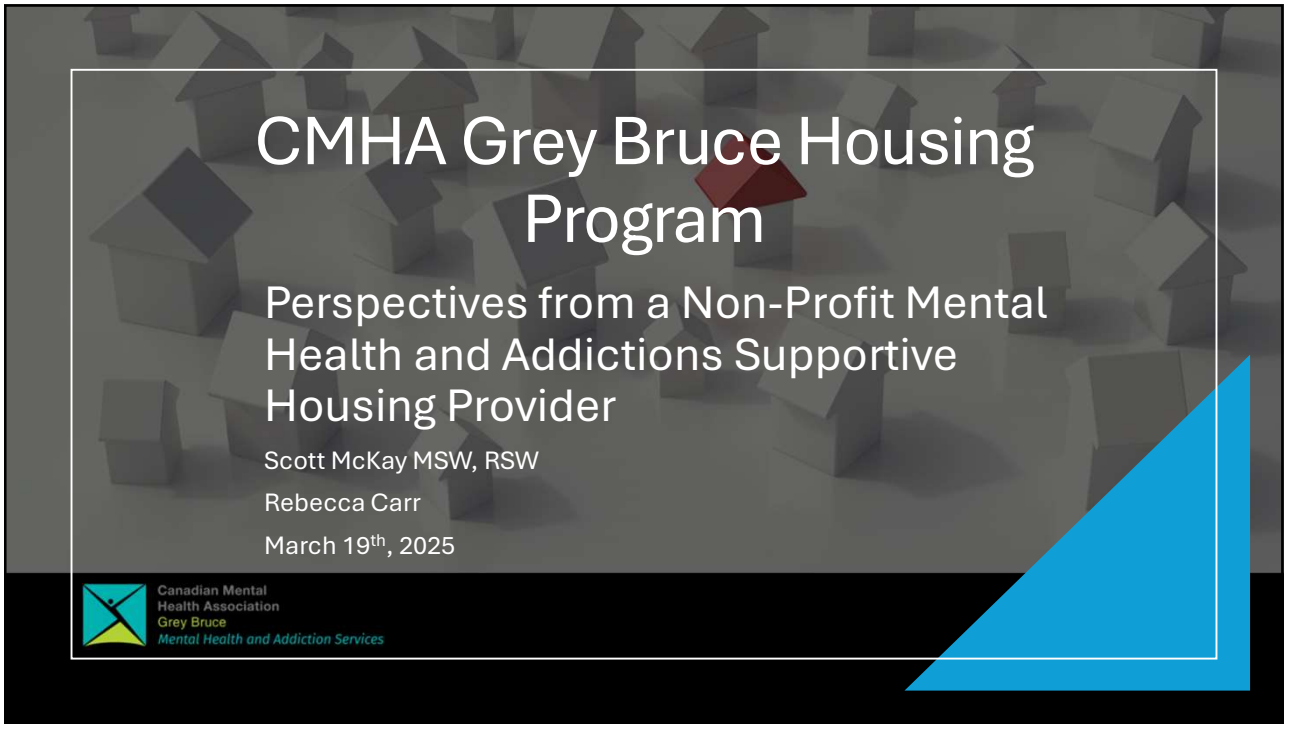
Opportunities to work Together

- Joint Provincial advocacy
- ConsistentAgreements with community housing providers
- Collaboration with local public health units and wider health sector
- Investing in new community, rental and supportive housing
- Investing in repairing existing community housing units
- Sharing best practices between communities
- Education for caseworkers, tenants and landlords
- Expanded Partnerships (ONPHA, CHF, OMSSA, RentSafe, OPHA, AMO, community legal clinics, others)
- Enforcement standards across the province or country
- Further studies on the impact of mould and information sharing

OMSSA
ONTARIO MUNICIPAL SOCIAL SERVICES ASSOCIATION

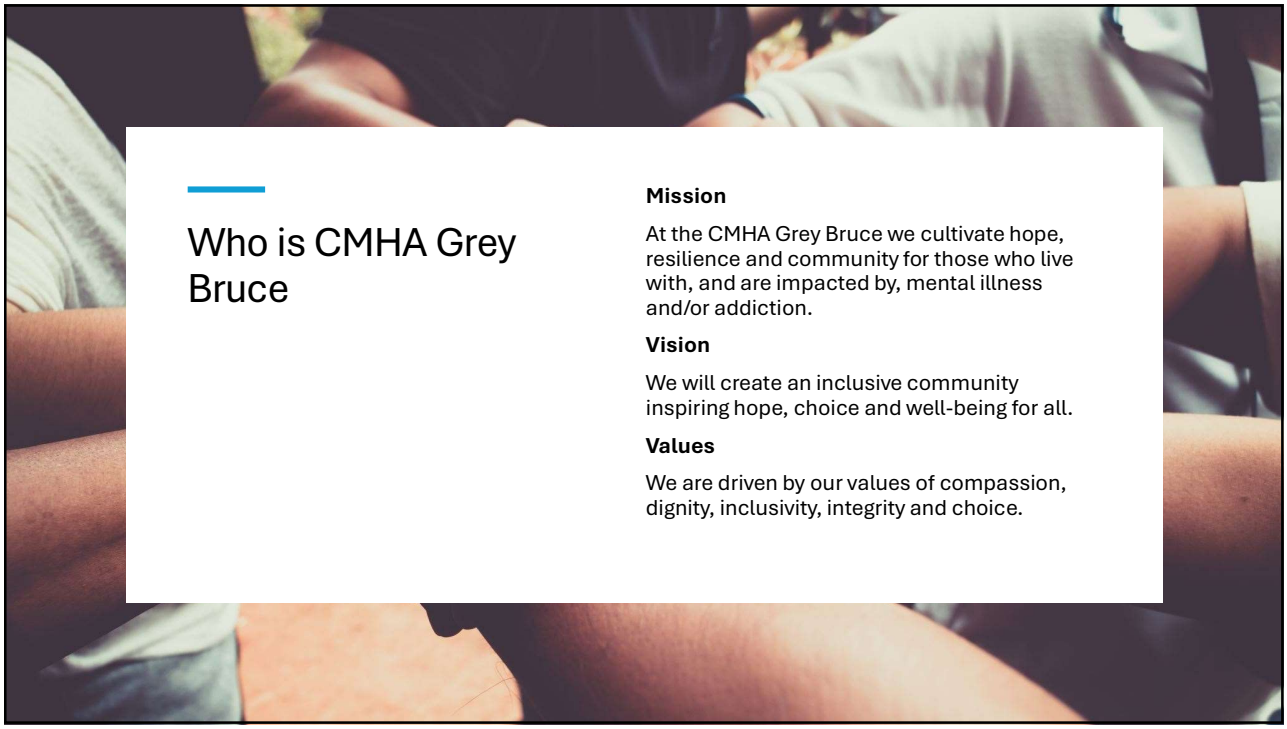
Thank you

Please feel free to contact Darryl Wolk at: dwolk@omssa.com with any questions or comments



Objectives

1. Who is CMHA Grey Bruce?
2. What is Supportive Housing?
3. Perspectives from a Non-Profit Mental Health and Addictions Supportive Housing Provider
4. Questions



Who is CMHA Grey Bruce

Mission

At the CMHA Grey Bruce we cultivate hope, resilience and community for those who live with, and are impacted by, mental illness and/or addiction.

Vision

We will create an inclusive community inspiring hope, choice and well-being for all.

Values

We are driven by our values of compassion, dignity, inclusivity, integrity and choice.

Programs & Services

- Addiction Services
- Mental Health Counselling
- Peer & Family Support
- Social Recreation & Rehabilitation Services
- Recovery College
- Social Enterprise
- Supportive Outreach Services (S.O.S.)
- Men's Program
- Education & Training
- Mobile Crisis Response
- Central Intake
- Supportive Housing

What is Supportive Housing

"Supportive housing combines housing assistance with wrap-around support services to help individuals, including those at risk of homelessness, with disabilities, mental health challenges, or substance use issues, live independently. These programs are designed to provide a stable and safe living environment with access to essential services."

-Addictions and Mental Health Ontario

- Support services include clinical and non-clinical services (e.g. counselling, case management, income support, and life skills training).
- Care Plans are developed with input for client/occupant based on bio-psychosocial assessment tools and are geared to support individuals to achieve or maintain recovery, build life skills required to maintain successful occupancies, and integrate individuals in their community.

Sources:

https://amho.ca/our-work/advocacy-awareness/supportive-housing/#:~:text=Supportive%20housing%20refers%20to%20housing,health%20and%20substance%20use%20challenges

https://amho.ca/wp-content/uploads/2023/10/Best-Practice-Guide-English.pdf

Supportive Housing

- Programs are largely funded through the Ontario Ministry of Health
- Overseen by Facilities Manager, Housing Manager, Manager of Community Mental Health and Addictions, and Manager of Residential Services
- Residential Support: Brooke House and Frank Street are Congregate Living settings that provide supported group living where rent is geared to income. Staff are available on-site throughout the day and evening.
- Community Homes for Opportunity: CHO staff use a recovery-based approach aiming to improve and/or stabilize physical and mental health, foster independence, and enhance participation and integration into the community.

Supportive Housing (cont.)

- Apartment Program: This program provides subsidized housing for individuals living with a serious mental illness who may be homeless or at risk of homelessness and would benefit from case management support.
- 14th Street Transitional Supportive Housing: 12 transitional supportive housing units with high-acuity mental health and addictions supports for individuals with mental illness and/or substance use issues who are homeless or at risk of homelessness.

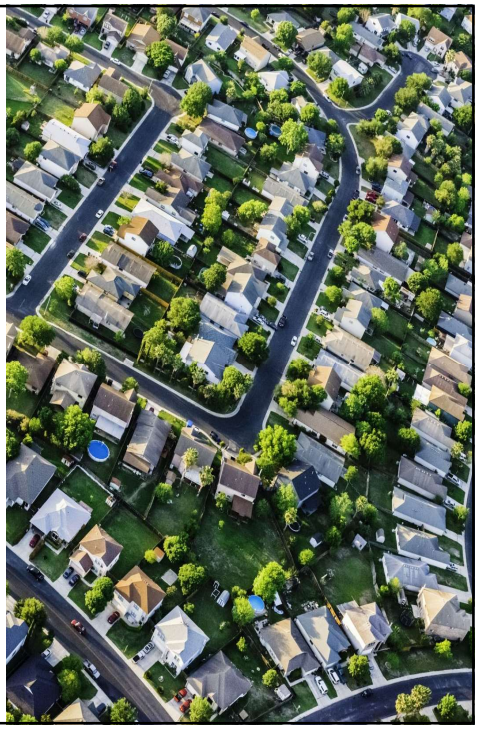
Perspectives from a Non-Profit Mental Health and Addictions Supportive Housing Provider

1. CMHA Grey Bruce's Dual Role in Buildings: Landlord and Tenant Support

- **Educating Landlords on Mental Health:** Many private landlords may not fully understand or be willing to accept occupants with mental health challenges. Common misconceptions about behaviour, reliability, liability and risk often leads to resistance to renting to individuals with mental health or addiction challenges.
- **Preventative approach to Property Management:** Working alongside support workers to ensure that occupants are adhering to program and building requirements as problems begin to arise rather than when it becomes an RTA concern.
- **Inconsistent Maintenance:** Housing Providers often rely on their property owners to maintain the property- property standards can vary between each property owner. This can result in subpar maintenance that can negatively affect occupant's quality of life. Examples include: delays in plumbing or electrical fixes, heating concerns etc.

CMHA Grey Bruce's Dual Role in Buildings- Landlord and Tenant Support (cont.)

- **Limited Influence on Property Decisions:** Nonprofit housing providers do not have any control in large decisions that can directly affect the occupancy. Some examples are selling the property, demolishing property, changing purpose of building etc.
- **Dual Advocacy.** Advocacy for occupants aim to ensure rent is affordable and that the housing is safe and well-maintained. Private landlords aim for a profitable return on investment. They need to cover the costs of maintenance, property management, and possibly other financial obligations, all while making the venture financially sustainable. return on investment. They need to cover the costs of maintenance, property management, and possibly other financial obligations, all while making the venture financially sustainable.
- **Complex Legal Framework-** Ensuring housing provider are complying with their organizational mandates and lease agreements while ensuring occupants are complying local landlord-tenant laws. Responsibility can become very complex as occupancy concerns arise.



2. Financial Pressure for Housing Providers & Private Landlords

- **Inflation and cost increases:**
  - Inflation rates were stable between 2015 – 2019 at roughly 2% annually but started to rise starting in 2021 with peak inflation coming in 2022 at 6.8%. Since 2021, it has started to decline.
  - Inflation leads to higher cost for property services such as maintenance cost, property taxes and utilities. Increased operating costs can affect housing providers and landlords by increasing the cost of materials and repairs of running apartments.
- **Market Rent Increases:**
  - Market rent values have increased locally by more than 50 % in the last 5 years in the private market which ultimately reduces the number of subsidies available as each apartment requires larger subsidy to offset rent.

Sources:

https://www.statista.com/statistics/271247/inflation-rate-in-canada/#:~:text=In%20general%2C%20the%20inflation%20rate,2017%20if%20estimates%20are%20correct

https://unitedwayofbrucegrey.com/living-in-bruce-grey-costs/

Financial Pressure for Housing Providers & Private Landlords (cont.)

- **Inconsistent Funding:** Housing Providers depend on government funding to cover the costs of operating housing. This funding can be inconsistent or insufficient, depending on government priorities, the availability of grants, and the specific needs of the program. This can result in gaps in funding, which may force the non-profit to either increase its own fundraising efforts or reduce the number of units available to clients.
- **Vacancy Rates:** Vacancy rates can be a financial challenge, particularly when clients leave or are evicted. If a unit remains vacant for an extended period, the non-profit may still be obligated to pay rent to the landlord, creating a financial strain. The non-profit must ensure there is a steady flow of clients and be prepared to manage situations where tenants leave unexpectedly.
- **Lack of Base Funding Increases:** Over the past 12 years, Community Mental Health and Addiction providers have only received a 5% increase to provincially funded programs (including housing subsidies), not keeping in line with the over 20% increase in inflation over this time period.

3. Mould Maintenance

The Property Owner, Housing Provider, and Occupant share the responsibility for reporting mould and maintaining proper living conditions

- **Property Owner Responsibility:** Private Landlords have a responsibility for maintaining the structural integrity of the property. This could involve fixing leaks, ensuring proper ventilation, and addressing any underlying issues that contribute to mold growth.
- **Housing Provider Responsibility:** Housing Provider as the managing party would share the responsibility with the occupant to ensure that proper living conditions are being met. This includes addressing occupant concerns, performing regular inspections, and managing repairs or remediation efforts for mold if it's related to tenant behavior, such as improper ventilation or water damage that they might have caused. Hosing Provider handles issues related to occupant behavior, such as excessive moisture from daily living activities (e.g., leaving water running, laundry or showering). Housing Providers are responsible for ensuring tenants are aware of proper ventilation or cleaning practices to prevent mold.

Mould Maintenance (cont.)

- **Occupant Responsibility:** Occupant is responsible for timely reporting of any signs of mould or water damage to housing provider, providing proper ventilation in unit (using exhaust fans, opening windows occasionally to allow air circulation, etc.) and regular cleaning of their apartment.
- Expectations include:
  - **Report mould or water damage to Housing Provider immediately**.
  - **Maintain good ventilation in areas prone to moisture (e.g., bathrooms, kitchen).**
  - **Control humidity and manage moisture levels in the unit.**
  - **Clean minor mould growth on non-porous surfaces but avoid cleaning extensive mould without professional help.**
  - **Cooperate with the landlord in addressing and remediating the mould issue.**
  - **Case Management provides support to assist Occupants/Client to meet expectations.**

Questions?

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Canadian Mental Health Association
Grey Bruce
Mental Health and Addiction Services

RentSafe

Putting it all together: Opportunities to improve prevention and responses to mould across sectors

Why address mould through collaboration across sectors?

- Improve prevention and early intervention
- Need for coordinated responses to immediate needs/acute issues
  - Leverage roles, responsibilities, expertise and capacity
- More effective service provision (referrals), policy change, system function
- Mould in housing is related to several issues:
  - System responses to rental housing issues
  - Housing maintenance
    - Tenant and Landlord Rights and Responsibilities
    - Government funding and incentives for preservation of existing affordable housing
  - Low-Income
    - Energy poverty
  - Climate change

Housing as an intersectoral issue
Involvement of other sectors

Public health	Tenants	Housing providers
Health care	Housing support	Housing developers
Legal services	Community Organizations	Emergency Services
Municipal governments	Indigenous governments	Provincial/territorial (P/T) governments
Federal government		

Policy Advocacy Opportunity
Mould By-Law

Ontario Association of Property Standards Officers (OAPSO)'s updated **model by-law on mould in housing** can be adopted by municipalities across Ontario to include robust mould remediation language and enhance capacity for enforcement of Property Standards.

- Now available through OAPSO's Model Property Standards By-Law (see by-law 4.16), and RentSafe at: https://rentsafe.ca/2025/03/07/model-mould-by-law/
- co-created with the expertise of both public health inspectors and municipal property/by-law officers, with representatives from provincial professional associations from public health and municipal services, and RentSafe
- Informed by a comprehensive scan of existing by-laws across Ontario

Community collaboration to address mould and unhealthy rental housing
Bright Spot on RentSafe Owen Sound Collaborative

RentSafe Owen Sound Collaborative has mobilized the findings from surveys of landlords and tenants to present a compelling case for action at the municipal level.

- Research findings presented to the City Council's Corporate Services Committee, highlighting the need to improve rental housing conditions and support landlords and tenants
- **Recommendations** include:
  - improve data collection,
  - adopt a mould model by-law, and
  - prioritize measures to help landlords maintain rental units and foster effective tenant-landlord relationships.

The committee unanimously approved a motion for City staff to explore actionable steps based on the report's recommendations.

Opportunities for action to address mould and unhealthy housing conditions in rental housing

- Patient/client tenant advocacy to address immediate/acute issues
- Policy advocacy:
  - Municipal mould by-law
  - Proactive rental inspection
  - Supports for tenants and landlords
    - mediation
    - supportive housing
    - hoarding support
    - affordability (of housing, energy, adequate income)
  - incentives for regular maintenance of rental housing
  - targeted funding for maintenance, retrofits of low-income rental housing (including supportive housing), remediation
  - funding for flood clean up (personal protective equipment - masks)

Addressing unhealthy conditions in rental housing: the case of mould

Wednesday, Mar 19, 2025
10 AM - 12 PM

Mould is one of the most common concerns contributing to unhealthy housing in Ontario

RentSafe.ca | Connecting people across sectors toward healthy housing for all